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**IOWA UTILITIES BOARD**  
**Customer Service Section**

Docket No.: FCU-2013-0006 (C-2013-0006  
and C-2013-0011)

Utility: Qwest Corporation d/b/a  
CenturyLink QC and InterMetro  
Communications, Inc.

File Date/Due Date: January 17, 2013

Memo Date: May 17, 2013

**TO:** The Board

**FROM:** Tara Ganpat-Puffett, Larry Stevens, and Mary Whitman

**SUBJECT:** Call Completion Issues

**I. Background**

Based on IUB Customer Service staff's investigation in the attached proposed resolutions for complaints C-2013-0006 and C-2013-0011, dated April 29, 2013, staff recommends that the Board, on its own motion, docket the complaints for further investigation of the telephone call completion problems noted in these complaints, as allowed by Iowa Code § 476.3(1). After IUB staff issued its proposed resolutions, the Consumer Advocate Division of the Department of Justice (Consumer Advocate) filed a "Joinder in Staff Request for Formal Proceeding" (Joinder).

Telephone call completion issues have been increasing in frequency as documented in several complaints filed with the Board, especially in rural areas. In addition, dropped telephone calls can be an important customer safety issue. The increased call completion or termination problems could point to failures due to the use of least cost routers for call completion. As detailed in several other complaint files involving similar call completion issues, many rural carriers believe that call completion problems begin with least cost routers, where call routing is handled by such intermediate or underlying providers.

The recent complaints that were the subject of the attached proposed resolutions describe difficulties that two sisters have experienced in completing telephone calls to their elderly mother. Both complainants also noted that due to these call completion difficulties, they had to drive long distances to check on the welfare of their mother, who is connected to a Lifeline medical alert through the local Red Oak, Iowa, hospital. These complaints are of particular interest because the complainants are the persons who originated the calls that allegedly did not complete. (In other cases before the Board, the complainants have been the

called party, not the calling party.) Further investigation would be useful to learn more about the causes for these call failures in this context.

In the informal investigation, CenturyLink, the local service provider for both complainants, stated its underlying carrier used in the call routing was InterMetro. InterMetro, in turn, stated it used an underlying carrier, but could not identify the carrier due to a confidentiality clause in its contract with that particular underlying carrier. As of this memo, InterMetro has not yet provided the vendor's information.

Iowa Code Section 476.3 provides, "If the board determines the public utility's response is inadequate and there appears to be any reasonable ground for investigating the complaint, the board shall promptly initiate a formal proceeding."

Further investigation is appropriate in this case for examination of the call completion issues, including the roles and responsibilities that the various carriers have regarding the call failures alleged in these two complaints. Moreover, initiating a formal proceeding would create a docket in which InterMetro could file a request for confidential treatment of the identity of its underlying carrier, allowing the investigation to proceed.

In its May 8, 2013, Joinder, Consumer Advocate concurs with staff that further investigation is needed regarding the roles and responsibilities of the various carriers, including the carrier used by InterMetro and identified by InterMetro as the cause of the call failures. Consumer Advocate also points out that further investigation is needed regarding the nature of the call completion problems to reach an understanding of how to prevent the problems before they occur.

## **II. Recommendation**

Further investigation is appropriate in this case and staff recommends that the Board initiate a formal proceeding to be assigned to the Board's administrative law judge.

### **RECOMMENDATION APPROVED**

### **IOWA UTILITIES BOARD**

/tgp

/s/ Elizabeth S. Jacobs      5-22-13  
Date

/s/ Swati A. Dandekar      5-21-13  
Date

\_\_\_\_\_  
Date



GOVERNOR TERRY E. BRANSTAD  
LT. GOVERNOR KIM REYNOLDS

ELIZABETH S. JACOBS, CHAIR  
DARRELL HANSON, BOARD MEMBER  
SWATI A. DANDEKAR, BOARD MEMBER

April 29, 2013  
File No. C-2013-0006  
PROPOSED RESOLUTION

Ms. Helen Adolphson  
1099 230th Street  
Emerson, IA 51533

Dear Ms. Adolphson:

On January 17, 2013, the Iowa Utilities Board (IUB or Board) received your complaint regarding rural call completion issues. Staff received responses from Qwest Corporation d/b/a CenturyLink QC (CenturyLink) on February 7, and March 21, 2013, and InterMetro Communications, Inc. (InterMetro) on April 19, 2013.

CenturyLink forwarded a copy of its response to you and the Office of Consumer Advocate (OCA). Staff is attaching InterMetro's response for you and the OCA's records. Below is the summary of your complaint, CenturyLink and InterMetro's responses, and the IUB staff findings:

#### Complaint:

Ms. Adolphson, your complaint states for the past several months you have had problems calling your mother, Mrs. Faye Wookey, in Emerson, Iowa. You stated your telephone provider is CenturyLink and your telephone number is [REDACTED]. Your mother's telephone provider is Interstate Communications and her telephone number is [REDACTED]. Your complaint states you have called Interstate Communications to troubleshoot numerous times and they are unable to find any problems with your mother's phone service. You noted the problems you have when you called your mother's number include:

- The phone rings but when you checked with your mother later she reported that the phone did not ring at her house.
- The phone rings once or twice, then you hear a busy tone.
- Calls are dropped.
- The call goes through, but the connection is so poor you can't hear each other.
- Sometimes the call goes through fine.

You stated this is extremely troubling since your mother is 97 years old and when you can't reach her by phone you drive to her home to ensure her welfare. You stated your sister (Charlotte Skallerup) and you have spoken with Interstate Communications and you are both reaching out to the IUB, hoping this problem can be resolved.

#### CenturyLink's Response:

In its response of February 7, 2013, CenturyLink stated in this case you are its customer and it conducted tests calls and found the calls completed without experiencing any of the trouble you indicated.

On March 21, 2013, CenturyLink provided an updated response. CenturyLink stated a trouble report ticket was opened by a CenturyLink technician for your telephone number (TN) [REDACTED], and [REDACTED] (your sister, Ms. Skallerup). The call records for those TNs were searched for calls that corresponded with the date and time information supplied by you. CenturyLink stated not all of the calls were found, but testing was able to continue with the calls that were found. CenturyLink stated its technician determined that the routing was the source of the problem for the three calls. An underlying carrier, InterMetro, was used to route the calls. InterMetro was removed by the CenturyLink's technician as an intrastate routing option to the 712 824 NPA/NXX local exchange, and a trouble report ticket was opened with InterMetro. According to CenturyLink, the technician contacted you at TN [REDACTED], and verified with you that calls are now completing without trouble to the Called TN.

CenturyLink stated the following is its standard investigation process for these types of complaints:

- Where there is an issue with the performance of a CenturyLink customer's long distance service, and the customer contacts CenturyLink, CenturyLink opens a trouble report ticket, the issue is identified and documented, and troubleshooting takes place.
- If the issue is related to routing, the route path is reviewed and may be changed and tested for efficacy to allow the customer's traffic to properly flow.
- If an underlying carrier is involved in the problem, it is removed from the path (NPA/NXX) and a trouble report ticket is opened with the underlying carrier. That carrier must conduct a root cause analysis, address the issue to resolution, take corrective action, test its fix, notify CenturyLink, and test with CenturyLink before CenturyLink will re-instate it to be used for processing calls, and close the trouble report ticket.
- The original customer issue is worked, its resolution tested and confirmed, and it is closed with the customer.

CenturyLink explained the following is how the call traffic is routed to rural telephone companies. Long distance traffic is routed based on the dialed digits.

- The route is designated based on the Local Exchange Routing Guide (LERG) information related to the local exchange of the called TN (for ported numbers,

the local routing number is used). Traffic that originates and terminates within a state has designated routing options. These are designated based on business and traffic needs. Traffic that goes between states has designated routing options as well, which are also based on business and traffic needs.

#### InterMetro's Response:

On April 19, 2013, InterMetro responded to your complaint and states that CenturyLink passed the call to InterMetro and InterMetro in turn handed the call to another provider to then complete the call directly in Iowa. InterMetro stated CenturyLink had independently identified an intermittent problem in this area and had submitted two trouble tickets to InterMetro.

InterMetro stated it promptly researched the matter, identified the provider with the intermittent problem, and permanently removed that provider from delivering calls to Iowa on behalf of InterMetro. Additionally, InterMetro stated it verified with CenturyLink that the call completion issue was fully resolved and InterMetro closed out the two trouble tickets. InterMetro summarized that the intermittent problem was resolved and permanently eliminated.

#### Staff Findings:

Based on staff review, the testing performed by CenturyLink indicated the problem was with InterMetro, CenturyLink's underlying carrier. Staff finds once CenturyLink removed InterMetro from the routing and performed test calls, the calls completed without issue. Staff notes that InterMetro stated the calls were handed off to another provider, but InterMetro has not provided the name of its underlying carrier.

Iowa Code Section 476.3 provides, "If the board determines the public utility's response is inadequate and there appears to be any reasonable ground for investigating the complaint, the board shall promptly initiate a formal proceeding."

#### Staff Recommendations:

Call completion issues have been increasing in frequency in complaints filed with the Board. This complaint describes that many of Ms. Adolphson's calls to her mother are not completing. The increased call completion problems could point to failures due to the use of least cost routers for call completion. Many rural carriers believe that call completion problems begin with least cost routers, and routing is handled by such intermediate or underlying providers. In this case InterMetro states a confidentiality clause in its contract with its underlying carrier prevents InterMetro from disclosing the identity of that carrier. InterMetro has not yet provided the vendor's information. Further investigation is appropriate in this case for examination of the call completion issues, including the roles and responsibilities the various carriers have regarding the call failures alleged in this complaint. Initiating a formal proceeding would create a docket in which InterMetro could file a request for confidential treatment of the identity of its underlying carrier, allowing the investigation to proceed. Staff will recommend that the Board initiate a formal proceeding on its own motion.

If anyone disagrees with staff's proposed resolution you have 14 days to submit your response. To do so, please send a copy of your response to our office, CenturyLink, InterMetro, and the Office of Consumer Advocate. Please refer to the C-file number listed at the top of this letter.

Ms. Adolphson, thank you for taking time to bring this matter to our attention. If we may be of assistance in the future, please do not hesitate to contact us. Our toll-free number is 877-565-4450.

Sincerely,

/s/

Tara Ganpat-Puffett  
Utility Analyst II  
Customer Services

cc: CenturyLink, 930 15th St, 11th Floor, Denver, CO 80202  
InterMetro, Judith A. Endejan, Attorney, Graham & Dunn PC, Pier 70, 2801  
Alaskan Way, Suite 300, Seattle, WA 98121-1128  
Office of Consumer Advocate, 1375 E. Court Avenue, RM 63, Des Moines, Iowa  
50319-0069



GOVERNOR TERRY E. BRANSTAD  
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ELIZABETH S. JACOBS, CHAIR  
DARRELL HANSON, BOARD MEMBER  
SWATI A. DANDEKAR, BOARD MEMBER

April 29, 2013  
File No. C-2013-0011  
PROPOSED RESOLUTION

Ms. Charlotte Skallerup  
22012 Goode Ave.  
Glenwood, IA 51534

Dear Ms. Skallerup:

On January 22, 2013, the Iowa Utilities Board (IUB or Board) received your complaint regarding rural call completion issues. Staff received responses from Qwest Corporation d/b/a CenturyLink QC (CenturyLink) on March 21, 2013, and InterMetro Communications, Inc. (InterMetro) on April 19, 2013.

CenturyLink forwarded a copy of its response to you and the Office of Consumer Advocate (OCA). Staff is attaching InterMetro's response for you and the OCA's records. Below is the summary of your complaint, CenturyLink and InterMetro's responses, and the IUB staff findings:

#### Complaint:

Ms. Skallerup, your complaint states for the past several months you have had problems calling your mother, Mrs. Faye Wookey, in Emerson, Iowa. You stated your telephone provider is CenturyLink and your telephone number is [REDACTED]. Your mother's telephone provider is Interstate Communications and her telephone number is [REDACTED]. Your complaint states you have called Interstate Communications and they have come to your mother's house and tested numerous times and can't find any problems. You stated you live 30 miles away from your mother and need to check on her often. In your complaint, you stated you have been told to have your phone checked, but you don't believe that is the problem since this is also an issue for your sister. You noted your sister's phone number is [REDACTED] and she lives in Red Oak, Iowa. You also noted your sister and you have no problems calling other people long distance. In addition your mother does not recall having problems calling long distance from her phone. You further stated you have experienced the following trouble calling your mother:

- The phone rings on your end and no one answers and when you checked with your mother you are told the phone never rang at her house.
- The phone rings once or twice, then it goes dead.

- At times the phone may ring, sounding fine for the first couple of rings, and then the ring sounds garbled and if your mother tries to answer, you cannot hear or understand each other.
- Calls are dropped.
- You have tried as calling as many as 8 to 10 times before the call may go through.
- You asked your mother how many times the phone rang before she answered and she has indicated she probably answered on the first or second ring.
- The call goes through, but the connection is so poor you can't hear each other.
- Sometimes the call goes through fine.

You stated the long distance service is unreliable and is a concern since you have to drive 30 miles to make certain your mother is doing okay. You are also concerned your mother had a lifeline alert through the Red Oak, Iowa hospital and you questioned if it works properly if her phone does not always work. You noted you have had the lifeline alert company replace the phone, but they do not think it is their problem.

#### CenturyLink's Response:

On March 21, 2013, CenturyLink provided a response. CenturyLink stated a trouble report ticket was opened by a CenturyLink technician for your telephone number (TN) [REDACTED] and [REDACTED] (your sister, Ms. Adolphson). The call records for those TNs were searched for calls that corresponded with the date and time information supplied by you. CenturyLink stated not all of the calls were found, but testing was able to continue with the calls that were found. CenturyLink stated its technician determined that the routing was the source of the problem for the three calls. An underlying carrier, InterMetro, was used to route the calls. InterMetro was removed by the CenturyLink's technician as an intrastate routing option to the 712 824 NPA/NXX local exchange, and a trouble report ticket was opened with InterMetro. According to CenturyLink, the technician contacted you at TN [REDACTED] and verified with you that calls are now completing without trouble to the Called TN.

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Utility Analyst II  
Customer Services

cc: CenturyLink, 930 15th St, 11th Floor, Denver, CO 80202  
InterMetro, Judith A. Endejan, Attorney, Graham & Dunn PC, Pier 70, 2801  
Alaskan Way, Suite 300, Seattle, WA 98121-1128  
Office of Consumer Advocate, 1375 E. Court Avenue, RM 63, Des Moines, Iowa  
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